

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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Byron Geovanny Arevalo Fajardo, Carlos Martell, Jose Gutierrez, Juan Pereyra, Iñigo Mendoza Ramirez (a/k/a Eduardo Mendoza Ramirez), Miguel Garrido, Reymundo Chavez Hernandez (a/k/a Ramon Chavez Hernandez), Richard Xavier Hernandez, and Sebastian Alfredo Espinosa Vargas (a/k/a Sebbby Espinosa Vargas),
on behalf of themselves and others similarly situated in the proposed FLSA Collective Action,

Case No.: 1:21-cv-5236

Plaintiffs,

- against -

WB Maintenance & Design Group Inc., W.B. & Son Construction Corp., Wladimir Briceno, Betty Briceno, Jeissy Briceno, and Jeimy Briceno,

Defendants.

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TEMPORARY EMERGENCY RESTRAINING ORDER AND PROTECTIVE ORDER

IT IS HEREBY ORDERED that Defendants Wladimir Briceno, Betty Briceno, Jeissy Briceno, Jeimy Briceno, Alexander Briceno their employees, agents, representatives, attorneys, servants and all persons acting on their behalf (collectively, the “Bricenos”), are restrained and enjoined from contacting or communicating with, in any way, any local, state or federal government official or agency, including but not limited to the United States Attorney General, the United States Attorney, the New York State Attorney General, the United States Department of Labor, the New York State Police, the INS, the United States Department of Homeland Security, and the United States State Department, with regard to the Plaintiffs Byron Geovanny Arevalo Fajardo (“Fajardo”), Carlos Martell (“Martell”), Jose Gutierrez (“Gutierrez”), Juan Pereyra (“Pereyra”), Iñigo Mendoza Ramirez (a/k/a Eduardo Mendoza Ramirez) (“Ramirez”), Miguel Garrido (“Garrido”), Reymundo Chavez Hernandez (a/k/a Ramon Chavez Hernandez) (“Chavez

Hernandez”), Richard Xavier Hernandez (“Xavier Hernandez”), Sebastian Alfredo Espinosa Vargas (a/k/a Sebby Espinosa Vargas) (“Vargas”), Jairo Rivas (“Rivas”), Elias Ordonez (“Ordonez”), and George Palta (“Palta”, and collectively, the “Plaintiffs”), and their attorneys; and it is further

ORDERED that the Bricenos are restrained and enjoined from contacting, threatening, harassing, intimidating, following, and/or assaulting Plaintiffs, in any form; and it is further

ORDERED that the Bricenos are restrained and enjoined from any further retaliation, in any form, against Plaintiffs; and it is further

ORDERED that if the Bricenos fail to comply with this preliminary injunction, they each, jointly and severally, may be held in either civil or criminal contempt, or both; and it is further

ORDERED that this preliminary injunction shall remain in full force and effect until further order of the Court; and it is further

ORDERED that the requirement of bond or other security under Rule 65(c) of the Federal Rules of Civil Procedure is waived and that plaintiffs shall not be required to post bond or other security in connection with the relief granted herein.

Dated: Brooklyn, New York

_____, 2020

The Honorable Sanket J. Bulsara
United States Magistrate Judge